

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RICK ALLEN,)	
)	
Plaintiff,)	08 C 676
)	
v.)	Honorable Judge
)	Virginia Kendall
INV. K. ELLIS #248, INV. SMITH #371)	
And INV. JONES # 454, individually,)	
)	
Defendants.)	

THE PARTIES' MOTION TO EXTEND DISCOVERY

Now Come the Parties, through counsel, and respectfully move this Honorable Court to extend discovery, and in support thereof state as follows:

1. On April 2, 2008, this Honorable Court ordered fact discovery closed on August 8, 2008 and expert discovery closed on September 9, 2008;
2. Discovery has not previously been extended;
3. The parties are hopeful about the possibility of settlement;
4. The parties have exchanged discovery and entered into settlement discussions;
5. Counsel for the Defendants' schedule and caseload including, but not limited to, Donald Martin Jr. v. Sheahan et al., 06 C 3946 has delayed the prompt resolution of this matter. The parties have worked together to promptly address scheduling conflicts;
6. Plaintiff's deposition is scheduled for August 20, 2008.

7. Extension of discovery will not prejudice either party.

WHEREFORE, the Parties respectfully request that their motion to extend discovery be granted.

Respectfully submitted,

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